

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division**

J&J SPORTS PRODUCTIONS, INC.,

Plaintiff,

V.

Case No. 2012-cv-3502

**SANDRA L. GATICA, indv. and d/b/a
SANDUNGAS MEXICAN RESTAURANT,
INC. d/b/a SANDUNGAS MEXICAN
RESTAURANT and SANDUNGAS MEXICAN
RESTAURANT, INC. d/b/a SANDUNGAS
MEXICAN RESTAURANT,**

Defendants.

**PLAINTIFF'S MOTION TO REINSTATE AND ENTER AN ORDER OF
JUDGMENT AGAINST THE DEFENDANTS**

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court Reinstate this matter against Defendants, SANDRA L. GATICA, indiv. and d/b/a SANDUNGAS MEXICAN RESTAURANT, INC. d/b/a SANDUNGAS MEXICAN RESTAURANT and SANDUNGAS MEXICAN RESTAURANT, INC. d/b/a SANDUNGAS MEXICAN RESTAURANT and enter an Order for Judgment, and in support thereof, states as follows:

1. That on January 9, 2013, this matter was dismissed by this Honorable Court, with leave to reinstate on or before April 30, 2013.
2. That a Settlement Agreement was entered into by both parties wherein which the Defendant would pay a total of \$6,000.00 to the Plaintiff on or before March 29, 2013. See attached Exhibit A.
3. As of the filing of this motion, Defendant has failed to make payment pursuant to the Settlement Agreement.
4. Plaintiff has been in contact with counsel for Defendants, Tim Biasello, regarding the default in the payment schedule wherein which Mr. Biasello stated to counsel for the Plaintiff that the Defendants do not intend on making any payment towards the Settlement agreement.

5. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$6,000.00 plus attorney's fees in the amount of \$600.00. See attached Exhibit A and B.

6. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See attached Settlement Agreement.

WHEREFORE, Plaintiff, J&J SPORTS PRODUCTIONS, INC., prays this Honorable Court enter an order to Reinstate this case against Defendants, SANDRA L. GATICA, indv. and d/b/a SANDUNGAS MEXICAN RESTAURANT, INC. d/b/a SANDUNGAS MEXICAN RESTAURANT and SANDUNGAS MEXICAN RESTAURANT, INC. d/b/a SANDUNGAS MEXICAN RESTAURANT, and enter an Order for Judgment in the amount Six Thousand and 00/100 (\$6,000.00) plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Nine Thousand Six Hundred and 00/100 (\$9,600.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu
Andre Ordeanu

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on April 30, 2013, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu
Andre Ordeanu

Zane D. Smith
ZANE D. SMITH & ASSOCIATES, LTD.
415 North LaSalle Street - Suite 501
Chicago, Illinois 60654

(312) 245-0031

(312) 245-0022 - Fax